

January 03, 2024

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(1) NAYARELI PULIDO and
(2) DAYANA ARLETH
CORNEJO-BUENO,**

Defendants.

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Case No: EP:24-CR-00006-KC

INDICTMENT

CT 1: 18 U.S.C. §§371, 554 – Conspiracy to Smuggle Goods from the United States

CT 2: 18 U.S.C. § 554 – Smuggling Goods from the United States

***Notice of Government's Demand for
Forfeiture***

THE GRAND JURY CHARGES:

COUNT ONE
(18 U.S.C. §§ 371 & 554)

Beginning on or about November 1, 2023, and continuing until on or about December 9, 2023, in the Western District of Texas, the Defendants,

**(1) NAYARELI PULIDO and
(2) DAYANA ARLETH CORNEJO-BUENO,**

knowingly and willfully did combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to commit the following offenses against the United States, that is, knowingly and unlawfully receiving, concealing, and facilitating the transportation and concealment of any merchandise, article, and object, prior to exportation, to-wit; 600 rounds of American Eagle 50 BMG 660 Grain FMJ ammunition, knowing the same to be intended for exportation from the United States, contrary to any law or regulation of the United States, in violation of Title 18, United States Code, Sections 371 and 554.

OVERT ACTS

One or more of the Defendants committed at least one of the following overt acts in furtherance of the conspiracy:

1. Defendant **(1) Nayareli PULIDO** opened a Chase bank account in October of 2023. In November of 2023, Defendant **(1) Nayareli PULIDO** provided the bank account information and her residence address to a subject in Mexico, so that person could order ammunition and have it shipped to her residence.
2. On or about December 6, 2023, five boxes containing a total of five hundred (500) rounds of 7.62x39mm ammunition were delivered to Defendant **(1) Nayareli PULIDO's** residence. Later that day, Defendant **(1) Nayareli PULIDO's** and Defendant **(2) Dayana Arleth CORNEJO-BUENO** drove a vehicle into Mexico.
3. On or about December 8, 2023, six boxes containing six hundred (600) rounds of .50 caliber ammunition were delivered to Defendant **(1) Nayareli PULIDO's** residence. The ammunition had been paid for out of the Chase bank account with funds provided by a person in Mexico. Defendant **(2) Dayana Arleth CORNEJO-BUENO** moved the boxes of ammunition inside the residence and informed the person in Mexico of the delivery of the ammunition via text message.
4. On or about December 8, 2023, Defendant **(2) Dayana Arleth CORNEJO-BUENO** and a subject in Mexico discussed via text messages payment for the transportation of ammunition. Also on this date, Defendant **(1) Nayareli PULIDO** and Defendant **(2) Dayana Arleth CORNEJO-BUENO** discussed via text messages how they were going to obtain a vehicle to transport the ammunition to Mexico.
5. On or about December 9, 2023, Defendant **(1) Nayareli PULIDO** and Defendant **(2) Dayana Arleth CORNEJO-BUENO** loaded the six boxes of ammunition into the trunk of a black 2020 Nissan Altima. Later that day, Defendant **(1) Nayareli PULIDO** and Defendant **(2) Dayana Arleth CORNEJO-BUENO** drove the 2020 Nissan Altima from the United States into Mexico.

COUNT TWO (18 U.S.C. §§ 554)

Beginning on or about November 1, 2023, and continuing until on or about December 9, 2023, in the Western District of Texas, the Defendants,

**(1) NAYARELI PULIDO and
(2) DAYANA ARLETH CORNEJO-BUENO,**

knowingly and unlawfully received, concealed, and facilitated the transportation and concealment of any merchandise, article, and object, prior to exportation, to-wit; 600 rounds of American Eagle 50 BMG 660 Grain FMJ ammunition, knowing the same to be intended for exportation from the United States, contrary to any law or regulation of the United States, all in violation of Title 18, United States Code, Section 554.

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. 32.2]

I.

Conspiracy to Smuggle Goods from the United States Violation and Forfeiture Statutes
[Title 18 U.S.C. §§ 371 and 554, subject to forfeiture pursuant to
Title 18 U.S.C § 981(a)(1)(C) and Title 19 U.S.C. § 1595a(d),
as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]

As a result of the foregoing criminal violations set forth above, the United States gives notice to Defendants **(1) NAYARELI PULIDO and (2) DAYANA ARLETH CORNEJO-BUENO** of its intent to seek the forfeiture of the property described below upon conviction and pursuant to FED. R. CRIM. P. 32.2, Title 18 U.S.C. § 981(a)(1)(C) and Title 19 U.S.C. § 1595a(d), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which state:

Title 18 U.S.C. § 981. Civil Forfeiture

(a)(1) The following property is subject to forfeiture to the United States:
* * *

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation . . . of this title or any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Title 19 U.S.C. § 1595a. Forfeiture and other penalties

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(d) Merchandise exported contrary to law

Merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting

or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be seized and forfeited to the United States.

Title 18 U.S.C. § 554 Smuggling Goods from the United States is an offense constituting “specified unlawful activity” as defined in Title 18 U.S.C. § 1956(c)(7).

The Notice of Demand of Forfeiture includes but is not limited to the property described in Paragraph II.

II.
Property

1. 600 rounds of American Eagle 50 BMG 660 Grain FMJ ammunition; and
2. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offense.

A TRUE BILL.

[Redacted]

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: 

Assistant U.S. Attorney